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ATTORNEYS FOR DEFENDANT  
ZF ACTIVE SAFETY US, INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

SALLY SYLVESTER, Individually and as  
Personal Representative of the Estate of Jesse  
Labrum, *et al.*,

Plaintiffs,  
vs.

BLUE BIRD CORPORATION, et al.,  
Defendants.

**JOINT MOTION TO DISMISS  
DEFENDANT ZF ACTIVE SAFETY US,  
INC. WITHOUT PREJUDICE**

Case No. 2:18-cv-00470-HN

Judge Howard C. Nielson, Jr.

Magistrate Judge Cecilia M Romero

Pursuant to Federal Rule of Civil Procedure, Rule 41(a)(2) and Local Rule DUCivR 7-1(a)(2)(G), Plaintiffs Sally Sylvester, individually and as Personal Representative of the Estate of Jesse Labrum, Deceased, Diane Larsen, Carolyn Dutson, Don Labrum, Gary Labrum, Doyle Labrum, Wayne Labrum, and Bruce Labrum, and Defendant ZF Active Safety US, Inc. ("ZF"), formerly known as Kelsey-Hayes Company, by and through their respective counsel of record, stipulate and move to dismiss Defendant ZF, including Kelsey-Hayes Company, from the above-captioned action without prejudice. Each party shall bear its own costs, expenses and attorneys' fees. This joint motion applies solely to Defendant ZF, including Kelsey-Hayes Company, and no other defendant.

A proposed order has been submitted herewith.

DATED this 14<sup>th</sup> day of January, 2021.

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Ronald L. Hellbusch  
ATTORNEYS FOR DEFENDANT  
ZF ACTIVE SAFETY US, INC.

FLINT LAW FIRM, LLC

By: /s/ Lawrence K. Holcomb  
ATTORNEYS FOR PLAINTIFFS  
(signed with permission by email)

#### CERTIFICATE OF SERVICE

I certify that on this 14<sup>th</sup> day of January, 2021, I electronically filed and served the foregoing **JOINT MOTION TO DISMISS DEFENDANT ZF ACTIVE SAFETY US, INC. WITHOUT PREJUDICE** through the Court's electronic filing system.

/s/ Aren Branagh